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AZ CORP COMMISSION
DOCUMENT CONTROL

Jay I. Moyes, No. 7207
Moyes Storey
3003 N. Central Ave. #1250
Phoenix, AZ 85012
602-604-2106

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

MARC SPITZER, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON
KRISTEN K. MAYES

Arizona Corporation Commission

DOCKETED

JAN 22 2004

DOCKETED BY

IN THE MATTER OF THE
APPLICATION OF ARIZONA PUBLIC
SERVICE COMPANY FOR A HEARING
TO DETERMINE THE FAIR VALUE OF
THE UTILITY PROPERTY OF THE
COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN
THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN, AND FOR APPROVAL
OF PURCHASED POWER CONTRACT

DOCKET NO E-01345A-03-0437

**MOTION AND CONSENT OF
LOCAL COUNSEL FOR PRO
HAC VICE ADMISSION OF
JESSE A. DILLON**


Pursuant to Rule 33 (c) and (d) Rules of the Supreme Court, Jay I. Moyes moves the
Arizona Corporation Commission to admit Jesse A. Dillon as counsel pro hac vice in this
action. The following exhibits are attached hereto:

1. The original Verified Application;
2. The original Certificate(s) of Good Standing; and
3. The State Bar of Arizona Notice of Receipt.

The filing fee has been submitted to the State Bar of Arizona. Jay I. Moyes, Moyes Storey, 3003 N. Central Ave. #1250, Phoenix, AZ 85012 hereby agrees to serve as designated local counsel for the subject case. A proposed order admitting Jesse A. Dillon accompanies this motion.

DATED this 22nd day of January, 2004.

MOYES STOREY LTD.


Jay I. Moyes
3003 N. Central Ave. #1250
Phoenix, AZ 85012
602-604-2106
jimoyes@lawms.com

Original and 13 copies of the foregoing filed
this 22nd day of January, 2004 with:

Docket Control
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

1 Copy of the foregoing hand-delivered this
2 *22* day of *June*, 2004 to:

3 Lyn Farmer
4 Chief Administrative Law Judge
5 Arizona Corporation Commission
6 1200 W. Washington St.
7 Phoenix, AZ 85007

8 Copies of the foregoing mailed this
9 *22* day of *June*, 2004 to:

10 Thomas L. Mumaw
11 Karilee S. Ramaley
12 Pinnacle West Capital Corporation
13 P.O. Box 53999, MS 8695
14 Phoenix, Arizona 85072

15 Jeffrey B. Guldner
16 Faraq Sanei
17 Snell & Wilmer
18 One Arizona Center
19 400 E. Van Buren St.
20 Phoenix, Arizona 85004

21 C. Webb Crockett
22 Fennemore Craig
23 3003 N. Central Ave., Suite 2600
24 Phoenix, Arizona 85012

25 Major Allen G. Erickson
AFCES A/ULT
139 Barnes Drive, Suite 1
Tyndall AFB, Florida 32403-5319
Attorney for FEA

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Cincinnati, Ohio 45202

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2 RUCO
3 1110 W. Washington St., Suite 220
4 Phoenix, Arizona 85007

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7 2100 N. Central Ave., Suite 210
8 Phoenix, Arizona 85067

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10 Zlubin & Enoch
11 349 N. Fourth Ave.
12 Phoenix, AZ 85003

13 Bill Murphy
14 Murphy Consulting
15 2422 E. Palo Verde Drive
16 Phoenix, AZ 85016

17 Jay L. Shapiro
18 Patrick Black
19 Fennemore Craig
20 3003 N. Central #2600
21 Phoenix, AZ 85012

22 Robert W. Geake
23 Arizona Water Co.
24 P.O. Box 29006
25 Phoenix, AZ 85038

26 Andrew W. Betwy
27 Bridget A. Branigan
28 Southwest Gas Corp.
29 5241 Spring Mountain Rd.
30 Las Vegas, NV 89150

31 Timothy M. Hogan
32 AZ Center for Law In the Public Interest
33 202 E. McDowell Rd. # 153
34 Phoenix, AZ 85004
35

1 Michael A. Cutis
2 William P. Sullivan
3 Larry Udall
4 Martinez & Curtis
5 2712 N. 7th Street
6 Phoenix, AZ 85006

7 Marvin S. Cohen
8 Sacks Tierney
9 4250 N. Drinkwater Blvd. 4th Flr.
10 Scottsdale, AZ 85251

11 Raymond S. Heyman
12 Laura Schoeler
13 Roshka Heyman & DeWulf
14 400 E. Van Buren #800
15 Phoenix, AZ 85004

16 Deborah R. Scott
17 Unisource Energy Services
18 One S. Church St. #200
19 Tucson, AZ 87502

20 J. William Moore
21 1144 E. Jefferson
22 Phoenix, AZ 85034

23 Cynthia Zwick
24 AZ Community Action Assoc.
25 2627 N. 3rd St. Suite 2
Phoenix, AZ 85004

26 S. David Childers
27 Low & Childers
28 2999 N. 44th St. #250
29 Phoenix, AZ 85018

30 James M. Van Nostrand
31 Katherine McDowell
32 George M. Galloway
33 Stoel Rives
34 900 SW Fifth Ave. #2600
35 Portland, OR 97204

1 Greg Patterson
2 Arizona Competitive Power Alliance
3 916 W. Adams #3
4 Phoenix, AZ 85007

5 Rebecca C. Salisbury
6 56th Fighter Wing JA
7 7383 N. Litchfield Rd.
8 Luke AFB, AZ 85309-1540

9 Allen Glen Erickson
10 139 Barnes Drive
11 AFCEA/ULT
12 Tyndall AFT, FL 32403

13 Jon Poston
14 AARP Electric Rate Project
15 6733 E. Dale Lane
16 Cave Creek, AZ 85331

17 Coralette Hannon
18 AARP Department of State Affairs
19 6705 Reedy Creek Rd.
20 Charlotte, NC 28215


21 Lawrence Robertson
22 Munger Chadwick
23 333 N. Wilmot #300
24 Tucson, AZ 95711

25 Jesse A. Dillon
PPL Services Corp
Two N. Ninth Street
Allentown, PA 18101

Christopher Kempley, Chief Counsel
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

1 Ernest Johnson, Director of Utilities
2 Arizona Corporation Commission
3 1200 W. Washington St.
Phoenix, Arizona 85007

4 Arizona Reporting Service, Inc.
5 2627 N. Third Street, Suite Three
Phoenix, Arizona 85004

6
7
8 
9
10



For Official Use Only

App# 1000841

Pro Hac ID # P150586

NONRESIDENT ATTORNEY PRO HAC VICE APPLICATION

Name: Jesse A. DillonResidence Address: 28 School Lane, Stevens, PA 17578Office Address: Two North Ninth Street, Allentown, PA 18101Telephone: 610-774-5013 Fax: 610-774-6726Title of cause or case where applicant seeks to appear: Arizona Public Service Rate CaseDocket Number: E-01345A-03-0437Court, Board, or Administrative Agency: Arizona Corporation CommissionParty on whose behalf applicant seeks to appear: PPL EnergyPlus, LLC & PPL Southwest Generation Holding

Courts to Which Applicant Has Been Admitted:

PennsylvaniaUnited States District Court for M.D. Pa.

Date of Admission:

December 9, 1986

Bar Number:

47580

Applicant is a member in good standing in such courts.

Applicant is not currently disbarred or suspended in any court.

Applicant ☐ is ☒ is not (select one) currently subject to any pending disciplinary proceeding or investigation by any court, agency or organization authorized to discipline attorneys at law.Jurisdiction(s) Where
Discipline Matter Pending:Nature of Matter
Under Investigation:Name / Address of
Disciplinary Authority:Applicant ☐ has ☒ has not (select one) been disciplined by any court, agency or organization authorized to discipline attorneys at law.

In the preceding three (3) years, applicant has filed applications to appear as counsel under Rule 33, Arizona Rules of Supreme Court in the following:

Title of Matter: Docket #: Court or Agency: Application Granted? (Y/N)

N/A N/A N/A N/A N/A

Name of local counsel: Jay I. Moyes, Moyes Storey Ltd.

State Bar of Arizona Number: 7207

Address: 3003 N. Central Avenue #1250, Phoenix, AZ 85012

Telephone: 602-604-2141 Fax: 602-274-9135

Name(s) of each party in this cause and name and address of all counsel of record:

| Party: | Counsel of Record: | Address: |
|--------------------------|--------------------|----------|
| <u>See Attached List</u> | | |
| | | |
| | | |
| | | |

Applicant is including with this application a nonrefundable application fee, payable to the State Bar of Arizona, in the amount of \$369.75.

This case or cause ☐ is ☒ is not (select one) a related or consolidated matter for which applicant has previously applied to appear pro hac vice in Arizona. If this matter is a related or consolidated with any previous application, applicant certifies the following:

Applicant certifies the following:

1. Applicant shall be subject to the jurisdiction of the courts and agencies of the State of Arizona and to the State Bar of Arizona with respect to the law of this state governing the conduct of attorneys to the same extent as an active member of the State Bar of Arizona, as provided in Rule 46(b) Rules of the Supreme Court.
2. Applicant will review and comply with appropriate rules of procedure as required in the underlying cause.
3. Applicant understands and shall comply with the standards of conduct required of members of the State Bar of Arizona.

Verification

Commonwealth of Pennsylvania
STATE OF Pennsylvania
County of Lehigh) ss.

I, the Applicant, swear that all statements in the application are true, correct and complete to the best of my knowledge and belief.

Dated: 01/13/04

Applicant's signature [Signature]

SUBSCRIBED AND SWORN TO before me this 13th day of January, 2004, by
Jessell Dillon
Name of Applicant

Francine A. Greenzweig
Notary Public

NOTARIAL SEAL
FRANCINE A. GREENZWEIG, Notary Public
City of Allentown, Lehigh County, PA
My Commission Expires Oct. 29, 2006

NOTE – As the application requires original signatures of the applicant and notary, this application cannot be filed electronically. Please submit all documents and fees by mail to:

State Bar of Arizona
Pro Hac Vice
111 West Monroe, Suite 1800
Phoenix, AZ 85003

For further information, please contact our Membership Records Department at 602-340-7239.

Thomas L. Mumaw
Karilee S. Ramaley
Pinnacle West Capital
Corporation
P.O. Box 53999, MS 8695
Phoenix, Arizona 85072

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Chief Counsel
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Phoenix, Arizona 85007

Ernest Johnson, Director
of Utilities
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Phoenix, Arizona 85007



Supreme Court of Pennsylvania

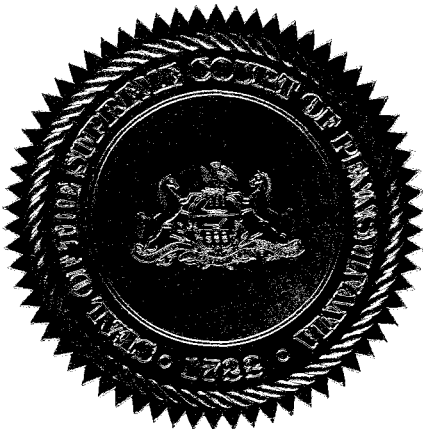
CERTIFICATE OF GOOD STANDING

Jesse Andrew Dillon, Esq.

DATE OF ADMISSION

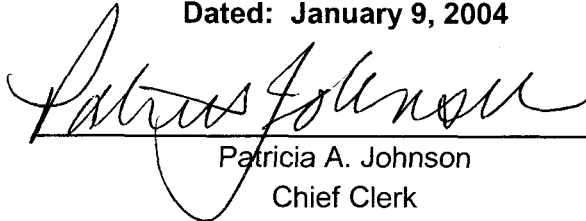
December 9, 1986

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: January 9, 2004


Patricia A. Johnson
Chief Clerk

1 **Arizona Corporation Commission**

2
3 Arizona Public Service Rate Case,)
Plaintiff,)
4 v.)
5 Defendant.)
6)

CASE # E 01345A03 0437

SBA App # 1000841

**NOTICE OF RECEIPT OF
COMPLETE APPLICATION**

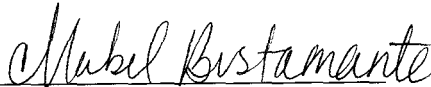
7
8 NOTICE IS HEREBY given by THE STATE BAR OF ARIZONA that it has
9 received the verified application and fee from Jesse A. Dillion

10 In addition to this application, applicant has made the following applications to appear
11 pro hac vice, pursuant to Rule33 (d), within the previous three (3) years:

| Title of Matter | Court/Agency | Date | Granted? | |
|-----------------|--------------|------|------------------------------|-----------------------------|
| | | | <input type="checkbox"/> yes | <input type="checkbox"/> no |
| | | | <input type="checkbox"/> yes | <input type="checkbox"/> no |
| | | | <input type="checkbox"/> yes | <input type="checkbox"/> no |
| | | | <input type="checkbox"/> yes | <input type="checkbox"/> no |

17 Exhibit A, the original verified application and Exhibit B, the original Certificate(s) of
18 Good Standing are attached hereto.

19 DATED this 21th day of January, 2004

20 
Mabel Bustamante
Resource Center
State Bar of Arizona

22 Original Mailed on
23 This 21th day of January, 2004 to:
24 Mr. Jay I. Moyes
25 3003 N Central Ave. #1250
Phoenix, AZ 85012-0001